

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: September 12, 2024 at 1:00 P.M. ET

Objection Deadline: July 24, 2024 at 4:00 P.M. ET

Ref. Nos. 17634 & 17646

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' FORTY-EIGHTH  
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR  
UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the "Debtors") hereby certify as follows to the best of my knowledge, information and belief:

1. On June 14, 2024, the Debtors filed the *Debtors' Forty-Eighth (Substantive) Omnibus Objection to Certain Overstated and/or Partially Unliquidated Proofs of Claim (Customer Claims)* [D.I. 17634, redacted & 17646, sealed] (the "Objection").

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 17634-1 & 17646-1], any responses to the Objection were to be filed no later than July 24, 2024, at 4:00 p.m. (ET) (the "Response Deadline").

3. The Debtors received informal responses (the "Informal Responses") to the Objection from the holders of claim numbers 58504, 54286, 92505, 25337 and 64916.

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

4. On June 27, 2024, Michael Lehrer filed a letter in response to the Objection [D.I. 19116] (the “Lehrer Response”).

5. On July 23, 2024, and July 26, 2024, Starboard Digital Strategies filed letters in response to the Objection [D.I. 21178 & D.I. 21636] (the “Starboard Responses”).

6. On August 8, 2024, Lukas Bartusek filed a letter in response to the Objection [D.I. 22777] (the “Bartusek Response”)

7. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the Debtors, beside the Lehrer Response, the Starboard Responses, and the Bartusek Response.

8. The Debtors have agreed to revise the proposed form of order attached to the Objection (the “Proposed Order”) to resolve the Lehrer Response.

9. The Debtors resolved the Informal Response from the holder of claim number 58504 without modification to the schedule attached to the Proposed Order.

10. The Debtors have revised the Proposed Order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the revision and adjournments to the Objection solely with regard to the claims of Bartusek and Starboard, and the holders of claim numbers 54286, 92505, 25337 and 64916. The Debtors have further revised the Proposed Order to reflect the withdrawal solely with regard to the holder of claim number 63042.

11. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Official Committee of Unsecured Creditors (the “Committee”), and counsel to Michael Lehrer. Counsel to Michael Lehrer and the Committee have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised

Order shall be uploaded to CM/ECF.

12. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: December 16, 2024  
Wilmington, Delaware

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